RCRA RECURDS CENTER FACILITY <u>ARROUDY INC</u> I.D. NO. MADO62319727 FILE LOC. ADMIN Record OTHER

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United States Environmental Protection Agency

John F. Kennedy Federal Building Boston, MA 02203-0001

Dear Mr. Olivier:

Mr. Thomas T. Olivier

Senior Enforcement Counsel

This responds to your letter of August 19, 1997 concerning the presence of PCBs at the Aerovox facility in New Bedford, Massachusetts. We are reviewing EPA's "Recommended Minimum Procedures for Immediate Personal Protection at Aerovox" and expect to respond upon Mr. Szwaja's return from vacation.

As discussed, on August 15, 1997; the day immediately following the meeting between EPA and Aerovox, employees were informed that the EPA had taken samples from the floor of the tank room of Aerovox's New Bedford plant in June. Employees were advised that sample results showed PCBs in excess of levels acceptable to EPA, a factor EPA interpreted as "improper disposal" of PCBs. All tank room workers on all three shifts were apprised of the EPA's concerns. In addition, stewards of both unions in the plant were informed and representatives from each department in the company attended an informational meeting. Meetings were conducted in English. Employees who are fluent in both English and Portuguese were on hand to explain any terminology that was not understood by employees who speak English as a second language.

The measures taken during routine cleaning to contain residual PCBs in the wood floor in the tank room were explained by Peter Szwaja. In addition, it was noted that tank room employees leave their shoes in the lockers in their department at the end of their work shift. A brief synopsis of the company's "Superfund" site status was presented for the few who were unaware of the history.

It was explained that the company intends to cooperate fully with the EPA and that employee health is very important to the company. At the same time, the company was surprised by the level of concern raised by the FPA, considering the widespread knowledge by the EPA and other federal and state agencies that PCBs were used in the manufacturing process in Aerovox's New Bedford plant for thirty years, and the absence of any evidence of adverse effects on worker health. It was emphasized that Aerovox has complied with all environmental statutes, fully and willingly, and will continue to do so.

If you have additional questions, please do not hesitate to call Mr. Cherney.

Jeffrey A. Templer

Sincerely,

Senior Vice President and CFO

IAT/djj EPA Olivier